

August 8, 2002

Stephen B. Kemp
Vice President
Health, Environment & Safety
Occidental Chemical Corporation
Corporate Office
Occidental Tower
5005 LBJ Freeway
Dallas, TX 75244-6119

Dear Mr. Kemp:

The Office of Pollution and Toxics is transmitting EPA's comments on the robust summaries and test plan for Chlorotoluenes, posted on the ChemRTK HPV Challenge Program Web site on March 8, 2002.

EPA reviews test plans and robust summaries to determine whether the reported data and test plans will provide the data necessary to adequately characterize each SIDS endpoint. On its Challenge Web site, EPA has provided guidance for determining the adequacy of data and preparing test plans used to prioritize chemicals for further work.

It is important to note that because you have indicated that you no longer manufacture these chemicals, we have assumed that you do not intend to revise, per our comments, the incomplete robust summaries included with your submission, nor do you intend to generate any data to fill the gaps identified in your test plan. We have noted on our Web site that you withdrew sponsorship of these chemicals. However, we do appreciate your efforts to make the available data on these chemicals publicly available.

EPA will post this letter and the enclosed Comments on the HPV Challenge Web site within the next few days. If you have any questions about this response, please contact Richard Hefter, Chief of the HPV Chemicals Branch, at 202-564-7649. Submit questions about the HPV Challenge Program through the HPV Challenge Program Web site "Submit Technical Questions" button or through the TSCA Assistance Information Service (TSCA Hotline) at (202) 554-1404. The TSCA Hotline can also be reached by e-mail at tsca-hotline@epa.gov.

We look forward to your continued participation in the HPV Challenge Program.

Sincerely,

Oscar Hernandez, Director
Risk Assessment Division

Enclosure

cc: W. Sanders
A. Abramson
C. Auer
M. E. Weber

**EPA Comments on Chemical RTK HPV Challenge Submission:
Monochlorotoluenes Category**

EPA COMMENTS

The sponsor, Occidental Chemical Corporation, submitted a test plan and robust summaries to EPA for the Monochlorotoluenes chemical category dated September 14, 2001. EPA posted the submission on the ChemRTK HPV Challenge Web site on March 8, 2002. The category consists of 1-chloro-2-methylbenzene (ortho-chlorotoluene, CAS No. 95-49-8); para-chlorotoluene (CAS No. 106-43-4); and chloromethylbenzene (CAS No. 25168-05-2).

In the cover letter for the test plan and robust summaries submitted on September 14, 2001, the submitter indicated that manufacture of the subject chemicals had ceased. The submitter, who had been the sole U.S. manufacturer of the chemicals, halted work on the test plan and robust summaries related to the HPV Challenge Program, and the test plan and robust summaries as they existed at that time were submitted to EPA.

EPA has reviewed the submission as is and has the following general comments.

1. The chemical identity of chloromethylbenzene (CAS No. 25168-05-2) is not clear. While the description in the test plan suggests that this category member is a mixture of the other two members, ortho- and para-chlorotoluene, this is not made explicit. Furthermore, there is no information on the possible ranges of isomeric composition. The submitter needs to clarify these aspects of "chloromethylbenzene's" identity.
2. In the test plan table, the submitter indicates that there are adequate physicochemical data for both ortho and para isomers. However, in its robust summary the submitter only provides p-chem data for para-chlorotoluene. The submitter needs to address the discrepancy.
3. The submitter does not identify the test substance in the photodegradation robust summary.
4. The submitter indicates in the test plan table that there are modeled biodegradation data available, but does not provide a robust summary.
5. In the test plan table, the submitter indicates that there are no data available for several endpoints. However, the submitter does not indicate whether these endpoints need to be tested.
6. In the test plan, the submitter indicates that there are adequate repeated-dose data for ortho-chlorotoluene. However, in the robust summary, the submitter provides repeated-dose data for a mixture of ortho (51 %) and para (48 %) isomers.
7. The ecotoxicity data submitted for fish and invertebrates using measured concentrations are adequate for the purpose of the HPV Challenge Program with the exception of some missing data elements.
8. In the case of algae, only nominal concentrations were used and are unacceptable because of likely loss of the chemical due to volatility observed in the submitted fish and invertebrate tests. However, because the submitter provided SAR data for algae which support the likely chemical loss due to volatility, overall the algal endpoint has been satisfied for the purpose of the HPV Challenge Program. The submitter is missing input values used to derive the SAR prediction for para-chlorotoluene.